

6. The observations made with many of the NRAO's telescopes could be significantly degraded if the Commission continues to chip away at the regulatory protections afforded the NRAO by site-by-site licensing and third-party determination of potential interference, relying instead on self-policing by Commission licensees. NRAO supports the Commission's efforts to facilitate telecommunications services to the public by removing unnecessary impediments to the provision of important services. However, without some measures of control to reduce the chances of interference, the potential harm to radio astronomy research, which is supposed to be protected under the Commission's rules, is greatly exacerbated.

7. The geographical licensing scheme employed by the Commission in other services and proposed to be used in the instant NPRM causes great concern to NRAO. The ability of the NRAO to identify the source of harmful interference is a difficult one, at best. However, the trend toward geographic and blanket licensing has hampered NRAO's efforts to identify, locate and contact the source for purposes of coordination and elimination of interference. It is one thing to encourage radio spectrum users "to make every practicable effort to protect radio astronomy facilities" but it is quite another when such effort fails, either through inadvertence, ignorance or, though rarely, by design.

8. The NRAO urges the Commission to adopt a licensing methodology that will permit rapid identification of the spectrum user in the event that harmful interference is received at a radio astronomy facility. While responding to the "explosive growth in demand for services", NPRM at ¶ 5, the Commission must continue to ensure that its rules do not hamper the NRAO's ability to prevent the contamination of its research. Otherwise, the Commission's stated goal of "balancing the costs of disruptions to existing users against the benefits of the new allocations" (Id. at ¶ 8) will fall short of achievement.

9. For the reasons outlined above, the NRAO opposes the use of geographic licensing for AWS in the 1.7 GHz and 2.1 GHz Bands when such licenses would permit operation of such services anywhere within the National Radio Quiet Zone. In addition, the NRAO would remind the Commission that the 1718.8 to 1722.2 MHz band should remain available for RA use and should not be made available for AWS use.

Respectfully submitted,

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